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*Counsel to Petitioning Creditors*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:	§	CASE NO. 23-30035-mvl7
	§	
ANIMO SERVICES, LLC,	§	(Chapter 7)
	§	
DEBTOR.	§	Hon. Michelle V. Larson
	§	

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**SUPPLEMENT TO: PETITIONING CREDITORS' MOTION TO COMPEL TOBY  
NEUGEBAUER TO PREPARE AND FILE THE DEBTOR'S LIST OF CREDITORS,  
SCHEDULES, AND STATEMENT OF FINANCIAL AFFAIRS**

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Undersigned counsel hereby supplements the Petitioning Creditors' above-captioned Motion (filed as Docket No. 34) as follows:

1. On April 17, 2023, counsel for the Petitioning Creditors met with Mr. Seidel's counsel to discuss the deficiencies in this case and obtaining information. Mr. Seidel received numerous documents relevant to With Purpose Inc.'s case from Mr. Neugebauer and his counsel. Mr. Seidel appears willing to assist and provide documents in his possession to aid in the preparation of Animo Services, LLC's list of creditors,

schedules, and statement of financial affairs, but has not committed to actually filing any documents.

2. Earlier, on or about March 31, 2023, I conferred by phone with Atty. Clay Taylor (at the time potential counsel for Toby Neugebauer), who informed me that he would oppose the Motion and that he also believes that the only party legally required to prepare the Debtor's schedules would be Mr. Seidel as the Ch. 7 Trustee for With Purpose, Inc. (the sole owner of Animo Services, LLC).

3. Undersigned counsel will endeavor to continue discussions with all parties leading up to any hearing on the Petitioning Creditors' Motion.

Respectfully submitted: April 23, 2023.

**MICHAEL BEST & FRIEDRICH LLP**

By: /s/ Justin M. Mertz  
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**Supplement to: Motion to Compel Toby  
Neugebauer to  
Prepare and File the Debtor's List of  
Creditors, Schedules, and Statement of  
Financial Affairs**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the 24<sup>th</sup> day of April, 2023, he caused a true and correct copy of this document to be served (a) via the Court's ECF notification system on all parties entitled to notice thereby, and (b) via first class mail, postage prepaid, on the following:

**Tony Neugebauer**  
10777 Straight Ln.  
Dallas, TX 75229

**Toby Neugebauer**  
PO Box 863376  
Plano, TX 75096

**Clay M. Taylor**  
Bonds Ellis Eppich Schafer Jones LLP  
420 Throckmorton St., Suite 1000  
Fort Worth, TX 76102

By: Justin M. Mertz  
Justin M. Mertz

**Supplement to: Motion to Compel Toby  
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